

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NAUTILUS INSURANCE CORPORATION,

Plaintiff,

v.

COA, INC. dba COASTER COMPANY OF
AMERICA, et al.,

Defendants.

Case No. 22-cv-5997

Judge Thomas M. Durkin
Magistrate Judge Beth W. Jantz

**DECLARATION OF HURR KO IN SUPPORT OF
DEFENDANT COA, INC. dba COASTER COMPANY OF AMERICA'S
MOTION TO DISMISS, OR IN THE ALTERNATIVE, MOTION TO
TRANSFER VENUE TO THE CENTRAL DISTRICT OF CALIFORNIA**

I, HURR KO, declare:

1. I, Hurr Ko, am the Director of Legal & Taxation at Defendant COA, Inc., dba Coaster Company of America ("Coaster").

2. I have personal knowledge of the following facts stated in this declaration, and if called as a witness I could, and would, competently testify thereto if called upon to do so.

3. I submit this declaration in support of Coaster's Motion to Dismiss, or in the Alternative, Motion to Transfer this Action to the Central District of California.

4. Coaster is a California corporation with its principal place of business at 12928 Sandoval St., Santa Fe Springs, California 90670. Attached hereto as **Exhibit "A"** is a true and correct copy of the January 12, 2023 Statement of Information filed by Coaster with the California Secretary of State.

5. Coaster is an importer and distributor of fine furniture.

6. Coaster maintains a website at www.coasterfurniture.com, which lists the types of furniture Coaster imports. Coaster does not sell furniture directly through its website.

7. Coaster's furniture is sold throughout the country, including in Illinois, through independent furniture stores.

8. Coaster does maintain an office/warehouse in Des Plaines, Illinois, from which its customers can pick up furniture, or arrange shipping of the furniture to their location.

9. On May 14, 2018, FurnitureDealer.net filed a First Amended Complaint in *FurnitureDealer.net v. Amazon.com, Inc., et al.*, United States District Court of Minnesota, Civil Case No. 0:18-cv- 00232 (JRN/FLN) (“*FDN Action*”), adding Coaster as a co-defendant.

10. Coaster provided notice of the *FDN Action* to its three insurers, Nautilus Insurance Company (“Nautilus”), Starr Indemnity & Liability Company (“Starr”) and Allied World Assurance Company (“Allied”) after being added as a co-defendant in the *FDN Action*.

11. All three insurers agreed to defend Coaster and have been defending Coaster in the *FDN Action* for nearly five years.

12. Nautilus issued a Commercial General Liability policy to Coaster, bearing policy No. BK200455500, for the policy period February 1, 2012 to February 1, 2013.

13. The Nautilus policy was issued and delivered to Coaster in California through a California broker. Attached hereto as **Exhibit B**” is a true and correct copy of the Declarations page of the Nautilus policy listing Brown & Riding, located in Los Angeles, California, as its broker.

14. Premiums for the Nautilus policy are made by Coaster from its California headquarters.

15. Coaster is being defended in the *FDN Action* by Cislo & Thomas LLP, located in Los Angeles, California.

16. All business decisions and related actions are undertaken by Coaster from its California headquarters.

17. All documents related to the insurance policies, the *FDN Action*, and Coaster’s business are located in California.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 26 day of January, 2023.

By: /s/ Huss Ko
Hurr Ko